Dr. Hammerschmidt:

As a researcher, I have been an active participant in field trials and committee discussions focused on the establishment of an effective national animal identification system. That experience has afforded me many opportunities to ponder potential pitfalls and advantages associated in establishing such a system. I also realize what a daunting task USDA-APHIS has undertaken. After reading the draft documents now put forth and taking into account my recent first hand experiences, I have a few comments that I would like to offer. I will preface these comments with the disclosure that the field trials I have and continue to coordinate are focused on the sheep industry, involve both RFID tags and RFID chips implanted under the skin, involve both young animals moving through slaughter channels and breeding animals remaining in a farm/ranch flock situation, and involve using the RFID technology in an on-farm disease eradication program.

Comment 1: I encourage USDA-APHIS to more thoroughly develop the group/lot identification processes and standards.

a. The current group/lot numbering system is inadequate. I encourage you to add an alphanumeric identifier for each group in addition to the PIN and date information. For example, the seven digit PIN followed by "GA" followed by the six digit date would identify Group A established on a given premises on a given date. If I interpret them correctly, the current draft documents put forth a process that would assign identical numbers to two groups established on the same premise on the same date. This is unacceptable for tracking purposes and the message that it sends in terms of our faith in using group/lot identification for tracking movements throughout the production system is inappropriate.
b. Start working now with feedlots, auction markets, and abattoirs to establish standards for handling incoming groups/ lots at their facilities including commingling and/or splitting the group into subgroups. If I am a producer who resists individually identifying each animal, the easiest way for me to work around that is by using the group/lot identification process when animals are shipped off of my premise. The receiving premise would then be responsible for recording receipt of that group and individually identifying the animals if they wished to handle the animals in a manner not conducive to group/lot movement tracking. Standard thought is that this expense will be passed on to the producer who dares deliver their animals without individual ID tags in place. USDA-APHIS needs to begin serious work now to ensure that there is a competitive alternative to this scenario developing.
c. In many cases, group/lot identification makes sense. I encourage USDA-APHIS to expand their focus in this area and develop it to the point that group/lot identification is viewed as a reliable method of tracking animals across all species in the standard slaughter channels. Tracking group/lot animal movements makes sense in terms of meeting the primary goal set forth in the establishment of the NAIS in an economically efficient and responsible manner. It is important not to confuse animal tracking with all of the other value-added opportunities that could be exploited with individual animal identification. Economic incentives already or will exist, unique to each industry, to stoke the fires of those who wish to exploit those opportunities.

Comment 2: I encourage USDA-APHIS to continue to explore RFID identification alternatives besides ear tags.

a. Our field trials have shown a consistent minimum of 1-2% RFID ear tag loss over a six month period for sheep. This is an on-going, accumulative loss effect. Without replacement, a significant portion of the flock would become unidentified after a few years meaning the probability is relatively high that an individual breeding animal will experience an interruption/discontinuity in its identification status during its productive life.
b. Our field trials also seem to indicate that the RFID implants compare favorably with the RFID ear tags over the initial six month period but without an accumulative loss effect. More study is needed but implants or rumen boluses may prove to be a more effective means of providing breeding stock with a permanent, individual, RFID identification.

Comment 3: By far the most daunting task will be actually tracking animal movements. These draft documents set forth an aggressive timeline for meeting these goals by 2009. I don't believe these goals can be met across all species with individual RFID tracking and reporting. The goals themselves are written generic enough that that doesn't have to be the case. However, everything else in the documents point in that direction. The lack of a more completely developed group/lot identification and tracking system is a glaring hole in the NAIS plan. This hole needs to be filled and incorporated into the timeline in order to meet the goals set forth in an efficient, effective, and economically responsible manner.

Comment 4: Much work still needs to be done to address the show animal situation. In my opinion, a system that effectively tracks individual show animals needs to be established well ahead of any goals related to identification of individual animals in traditional production channels. Show animal movement presents a significant bioterrorism threat that can only be addressed through individual animal identification.

I want to commend USDA-APHIS in their efforts to push forth with the establishment of a national animal identification system. It is clear that there will not be a narrowly defined one-size fits all solution that works well across all species and all production practices. Therefore, it is easy for parties opposed to the NAIS to punch significant holes in any comprehensive proposal put forth at this time. I encourage USDA-APHIS to continue in their steadfast approach to establishing a system that works and thank you for the opportunity to comment at this time.

Sincerely,

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